

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
GREENBELT DIVISION**

ANITA LANN, et al.,)
)
)
Plaintiffs,) Civil Action No.: 14-cv-2237 (PJM)
)
)
)
)
)
TRINITY HEALTH)
CORPORATION, et al.,)
)
)
Defendants.)
)
)

**MOTION FOR PRELIMINARY APPROVAL OF THE CLASS ACTION SETTLEMENT
AGREEMENT**

Plaintiffs Anita Lann, Jean Atcherson, Albert R. Chavies, and Thomas Holland (“Named Plaintiffs”), by and through their attorneys, respectfully move the Court for an Order: (1) preliminarily approving the Class Action Settlement Agreement (“Settlement” or “Settlement Agreement”) between the Parties; (2) preliminarily certifying the proposed Settlement Class pursuant to Federal Rules of Civil Procedure 23(b)(1) and/or 23(b)(2); (3) approving the form and method of Class Notice; and (4) setting a date and time for a hearing (the “Fairness Hearing”) for consideration of final approval of the Settlement, of payment of attorneys’ fees and expenses, and of a potential Incentive Award to certain Plaintiffs.

Dated: August 1, 2016

Respectfully submitted,

COHEN MILSTEIN SELLERS & TOLL PLLC

/s/ Michele C. Yau

Karen L. Handorf (admitted *pro hac vice in Lann and in Chavez*)
Michelle C. Yau (admitted *pro hac vice in Lann*)

Mary J. Bortscheller (admitted *pro hac vice*)
1100 New York Avenue, N.W.
Suite 500, East Tower
Washington, D.C. 20005
Tel: (202) 408-4600
Fax: (202) 408-4699
Email: myau@cohenmilstein.com
khandorf@cohenmilstein.com
mbortscheller@cohenmilstein.com

KELLER ROHRBACK L.L.P.
Lynn Lincoln Sarko
Havila Unrein
Matthew Gerend
1201 Third Avenue, Suite 3200
Seattle, WA 98101
Tel: (206) 623-1900 / Fax: (206) 623-3384
Email: lsarko@kellerrohrback.com
hunrein@kellerrohrback.com
mgerend@kellerrohrback.com

KELLER ROHRBACK L.L.P.
Ron Kilgard
Laurie B. Ashton
3101 North Central Avenue, Suite 1400
Phoenix, AZ 85012
Tel: (602) 248-0088 / Fax: (602) 248- 2822
Email: rkilgard@kellerrohrback.com
lashton@kellerrohrback.com

Counsel for Plaintiffs

CERTIFICATE OF ELECTRONIC SERVICE

I hereby certify that on August 1, 2016, I electronically filed the foregoing Motion for Preliminary Approval and Memorandum in support thereof, with the Declaration of Michelle C. Yau and attachments, using the CM/ECF system, which will automatically send e-mail notification of such filing to the attorneys of record.

Dated: August 1, 2016

/s/ Michelle C. Yau

Michelle C. Yau